

From: KurtSchwarz
Affiliation: Howard County (Maryland) Bird Club
Address: 9045 Dunloggin Ct.
Ellicott City, Maryland, 21042

- 1 Comment: 1. Alternative A, No-Action - The Howard County Bird Club urges BLM to adopt Alternative A, the No-Action Alternative. We believe the SPA and the restrictions adopted in 1998 are essential to protect the precious national heritage of wildlife at Teshekpuk Lake. A member of the Howard County Bird Club has visited this part of NPRA and told us of its high wildlife values. In addition, the wildlife of the area has been documented by previous efforts of the Department of the Interior and has been studied by wildlife biologists over many decades. NPRA has been identified as a Globally Important Bird Area by the American Bird Conservancy.
- 002 Alternatives 2. Teshekpuk Lake Surface Protection Area - We oppose the reduction of the Surface Protection Area. This area, established by Secretary of the Interior Bruce Babbitt, is a minor part of NPRA, but it has very high wildlife values. It should be kept completely out of the oil and gas program. The established boundaries of 858,000 acres should be retained for the security of the wildlife, including the ban on surface occupancy for any oil and gas activities. This Surface Protection Area will be all the more valuable for wildlife as the surrounding lands of NPRA are developed for oil and gas. Teshekpuk Lake and its surrounding wetlands complex is a very important part of that great wildlife region. Notable birds of Teshekpuk Lake include large populations of four species of geese which congregate there in the molting season and crucial nesting populations of Spectacled Eider, Yellow-billed Loon, Red-throated Loon, Long-tailed Duck, King Eider, and Buff-breasted Sandpiper. The Teshekpuk Lake caribou herd, 45,000 strong, has its calving area near the lake, then uses different areas there for insect relief after calving. We do not believe the wildlife can survive if oil and gas activities are allowed in the area.
- 003 Wildlife
- 004 Roads 3. Environmental Stipulations applied to oil and gas activities in NPRA. It would be unwise to repeal the prohibition on building permanent roads during exploration drilling. In the Arctic, even temporary roads pose a serious problem to reclaim when they are no longer needed. The exploration phase is a time to move lightly on the land, because no decision has been made to develop an oil and gas field.
4. The Howard County Bird Club is an organization with a membership of more than 200 families and individuals in Howard County, Maryland. We are a chapter of the Maryland Ornithological Society, a nonprofit, statewide organization of people who are interested in birds and nature. Our purposes include promoting the study and enjoyment of birds, promoting knowledge about our natural resources, and fostering their appreciation and conservation. We offer field trips, bird counts, and conservation projects. Our members travel all over the United States to visit areas of federal land on birding and nature-watching vacations. We spend dollars on food, lodging, books and souvenirs to support the local economy wherever we go. Moreover, birding is one of the fastest-growing outdoor sports.

Attached: HCBCNPRAAug2004.doc

Document Attachment from previous website statement included as part of comment number 182845

182845 (Cont'd)

HOWARD COUNTY BIRD CLUB

**9045 Dunloggin Court
Ellicott City, Maryland 21042**

August 15, 2004

Northeast NPR-A Amendment Planning Team
Bureau of Land Management (930)
222 West 7th Avenue
Anchorage, AK 999513
http://nenpra.ensr.com/nenpra/participation_comments.htm

To the Bureau of Land Management:

The Howard County Bird Club appreciates the opportunity to submit the following comments on the proposed amendment to the oil and gas leasing plan and draft environmental impact statement for the northeast section of the National Petroleum Reserve-Alaska.

A member of the Howard County Bird Club has visited this part of NPRA and told us of its high wildlife values. In addition, the wildlife of the area has been documented by previous efforts of the Department of the Interior and has been studied by wildlife biologists over many decades. NPRA has been identified as a Globally Important Bird Area by the American Bird Conservancy.

The Howard County Bird Club is an organization with a membership of more than 200 families and individuals in Howard County, Maryland. We are a chapter of the Maryland Ornithological Society, a nonprofit, statewide organization of people who are interested in birds and nature. Our purposes include promoting the study and enjoyment of birds, promoting knowledge about our natural resources, and fostering their appreciation and conservation. We offer field trips, bird counts, and conservation projects. Our members travel all over the United States to visit areas of federal land on birding and nature-watching vacations. We spend dollars on food, lodging, books and souvenirs to support the local economy wherever we go. Moreover, birding is one of the fastest-growing outdoor sports.

Teshekpuk Lake

The proposal contemplates cutting back the Teshekpuk Lake Surface Protection Area to 213,000 acres, less than one-fourth of its present size. The rest would be opened to oil and gas leasing. To put this in perspective, we observe that 87 percent of the 4.6 million acres in the Northeast planning area of NPRA is already open to leasing, and 1.4 million acres is already leased and under exploration.

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Alternatives

We oppose the reduction of the Surface Protection Area. This area, established by Secretary of the Interior Bruce Babbitt, is a minor part of NPRA, but it has very high

wildlife values. It should be kept completely out of the oil and gas program. The established boundaries of 858,000 acres should be retained for the security of the wildlife, including the ban on surface occupancy for any oil and gas activities. This Surface Protection Area will be all the more valuable for wildlife as the surrounding lands of NPRA are developed for oil and gas.

The North Slope of Alaska has rightly been described as “America’s Serengeti.” Teshekpuk Lake and its surrounding wetlands complex is a very important part of that great wildlife region. Notable birds of Teshekpuk Lake include large populations of four species of geese which congregate there in the molting season and crucial nesting populations of Spectacled Eider, Yellow-billed Loon, Red-throated Loon, Long-tailed Duck, King Eider, and Buff-breasted Sandpiper. The Teshekpuk Lake caribou herd, 45,000 strong, has its calving area near the lake, then uses different areas there for insect relief after calving. We do not believe the wildlife can survive if oil and gas activities are allowed in the area.

Stipulations

We also urge BLM not to weaken the environmental stipulations applied to oil and gas activities in NPRA. It would be unwise to repeal the prohibition on building permanent roads during exploration drilling. In the Arctic, even temporary roads pose a serious problem to reclaim when they are no longer needed. The exploration phase is a time to move lightly on the land, because no decision has been made to develop an oil and gas field.

Alternatives

Three alternatives are described in the BLM proposal: Alternative A, the No Action Alternative, retains the Surface Protection Area (SPA) and the current environmental restrictions adopted by the Department in 1998. Alternative B, the Preferred Alternative, reduces the SPA to 213,000 acres and changes the environmental restrictions. Alternative C abolishes the SPA altogether, opening all lands to leasing.

The Howard County Bird Club urges BLM to adopt Alternative A, the No-Action Alternative. We believe the SPA and the restrictions adopted in 1998 are essential to protect the precious national heritage of wildlife at Teshekpuk Lake.

Thank you for considering our comments.

Sincerely,

Kurt R. Schwarz
President